## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
<b>v.</b>	)	CR. NO. 2:05 -cr-294 -MEF
	)	
JENNIFER VANHUNNIK	)	

## MOTION TO DECREASE DEFENDANT'S OFFENSE LEVEL PURSUANT TO § 3E1.1(b), UNITED STATES SENTENCING GUIDELINES (ACCEPTANCE OF RESPONSIBILITY)

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and respectfully moves this Court to reduce by one (1) level Defendant's offense level based on her acceptance of responsibility. As grounds for this Motion, the United States avers as follows:

On December 14, 2005, the United States filed a two-count indictment against the Defendant.

Defendant notified the United States of her intent to plead guilty to the indictment sufficiently early to permit the government to avoid preparing for trial and to allocate its resources efficiently. Defendant pled guilty on September 28, 2007.

Therefore, pursuant to United States Sentencing Guidelines § 3E1.1(b), as amended, the United States makes this formal motion for a one-level reduction in the Defendant's offense level for acceptance of responsibility such that the total reduction in offense level for the Defendant's acceptance of responsibility shall be three (3) levels.

WHEREFORE, the United States respectfully requests that this Motion be GRANTED and that the Court reduce Defendant's offense level by one level for her acceptance of responsibility.

Respectfully submitted this 27th day of November, 2007.

LEURA G. CANARY UNITED STATES ATTORNEY

/s/ Susan R. Redmond SUSAN R. REDMOND Assistant United States Attorney 131 Clayton Street Montgomery, AL 36104 334.223.7280 334.223.7138 fax susan.redmond@usdoj.gov

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## CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to attorney for the Defendant: Daniel Hamm.

Respectfully submitted,

LEURA G. CANARY UNITED STATES ATTORNEY

/s/ Susan R. Redmond SUSAN R. REDMOND Assistant United States Attorney 131 Clayton Street Montgomery, Alabama 36104 Telephone: (334) 223-7280 Fax: (334) 223-7138 susan.redmond@usdoj.gov